

ORIGINAL

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3/28/01IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIALEWIS JOHNSON
Plaintiff,

CIVIL ACTION NO. 1:CV-00-1873

v.

HERSHEL W. GOBER, Acting
Secretary Of Veterans Affairs;
RODNEY KISCADDEN; ALICE
FIDLER; PEG WINTERS; IRVIN
ERICKSON; RAYMER KENT; and
AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES
LOCAL 1966
Defendants

(Judge Kane)

JURY TRIAL DEMANDED

FILED
HARRISBURG, PA

MAR 27 2001

ANDREA, CLERK
3/28/01**MOTION FOR ENLARGEMENT OF TIME WITHIN WHICH
TO COMPLETE SERVICE OF PLAINTIFF'S COMPLAINT**

AND NOW, comes Plaintiff, Lewis Johnson, by his attorney, Andrew J. Ostrowski, pursuant to Fed. R. Civ. P. 4(m), and in support of his Motion for Enlargement of Time Within Which to Complete Service of his Complaint, avers as follows:

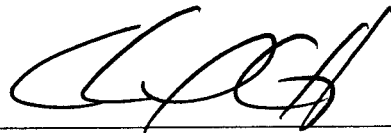
1. Plaintiff's Complaint was filed, pro se, on October 23, 2000.
2. Within 120 days of filing, Plaintiff had attempted service on Defendants and received waivers of service from Defendants American Federation of Government Employees and Peg Winters, but received no response from the remaining Defendants.
3. Undersigned Counsel subsequently entered an appearance for Plaintiff during a time when Counsel was in the midst of relocating his practice, an undertaking that required considerable time and effort.
4. In preparation for the Case Management conference scheduled by the Court, Plaintiff's Counsel determined that, other than AFGE and Winters, no Defendant has pleaded in response to

Plaintiff's Complaint or otherwise appeared to defend against the allegations of his Complaint, and Plaintiff's initial service attempts may have been defective.

5. Plaintiff has initiated efforts to effect proper service on all Defendants, and, inasmuch as Plaintiff has exercised diligence in attempting service, and has kept the Court advised of the status, Plaintiff requests an enlargement of time within which to make service.

WHEREFORE, Plaintiff respectfully requests an appropriate Order enlarging the time within which to serve the Summons and Complaint.

Respectfully submitted,



Andrew J. Ostrowski, Esquire
I.D. No. 66420
Suite 201, 2080 Linglestown Road
Harrisburg, PA 17110
(717) 540-9170
Attorney for Plaintiff

Dated: March 27, 2001

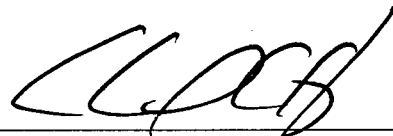
**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

LEWIS JOHNSON	:	CIVIL ACTION NO. 1:CV-00-1873
Plaintiff,	:	
	:	
v.	:	
	:	
HERSHEL W. GOBER, et. al.,	:	(Judge Kane)
Defendants	:	JURY TRIAL DEMANDED

CERTIFICATE OF CONCURRENCE/NONCONCURRENCE

I, Andrew J. Ostrowski, Esquire, certify that I have contacted Counsel for Defendants AFGE and Peg Winters who has indicated that those Defendants will not oppose the foregoing Motion.

By



Andrew J. Ostrowski, Esquire
I.D. No.: 66420
4311 North Sixth Street
Harrisburg, PA 17110
(717) 221-9500
Attorney for Plaintiff

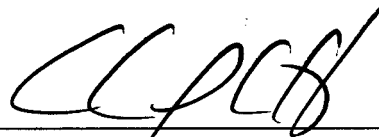
Dated: March 27, 2001

CERTIFICATE OF SERVICE

I, Andrew J. Ostrowski, Esquire, hereby certify that I have served a true and correct copy of the foregoing document, by depositing such in the U.S. Mail, first class, postage prepaid, addressed as follows:

Martin R. Cohen, Esquire
Suite 117, 10 Presidential Blvd.
Bala Cynwyd, PA 19004

By



Andrew J. Ostrowski, Esquire
4311 North Sixth Street
Harrisburg, PA 17110
(717) 221-9500

Dated: March 27, 2001